

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR and
NATALIE ANDERSON,
Plaintiffs,

v.

CRAIG S. DONAIS, RUSSELL F.
HILLIARD, DONAIS LAW OFFICES
PLLC, MARY K. DONAIS, UPTON &
HATFIELD, LLP, and AMY MESSER,
Defendants.

Case No. 1:25-cv-00251-SE-AJ

**DEFENDANT RUSSELL F. HILLIARD'S MOTION TO EXTEND TIME TO FILE A
RESPONSE TO PLAINTIFFS' FIRST AMENDED COMPLAINT**

Defendant Russell F. Hilliard, by his attorneys, Preti Flaherty Beliveau & Pachios, LLP, respectfully submits the within Motion to Extend Time to File a Response to Plaintiffs' First Amended Complaint, and in support thereof, represents as follows:

1. This action was initiated by then sole-Plaintiff Andre Bisasor with a filing in Hillsborough Superior Court on June 3, 2025. The matter was then removed to this Court by co-defendants on July 2, 2025. Mr. Hilliard filed a Motion to Dismiss on July 10, 2025.

2. On July 29, 2025, the First Amended Complaint was filed. Along with adding several new claims against Mr. Hilliard, the First Amended Complaint included a new Plaintiff (Natalie Anderson), and two new Defendants (The Honorable Amy Messer and Upton Hatfield¹). A Motion to Remand was filed on August 1, 2025.

3. The undersigned has accepted service for Upton & Hatfield, LLP, which makes its deadline to respond to the Complaint October 14, 2025. *See* Doc. no. 18. Nonetheless, in order to avoid

¹ Presumably, Upton & Hatfield, LLP, which is the law firm that Mr. Hilliard works for.

piecemeal responses, if an extension for Mr. Hilliard to respond until September 3, 2025 is allowed, a single response on behalf of Mr. Hilliard and Upton & Hatfield is expected to be filed by that date.

4. The undersigned asserts that good cause exists to extend the deadline to allow counsel to fully review the issues presented in the First Amended Complaint and respond accordingly.

5. Pursuant to Local Rule 7.1(c), the undersigned counsel attempted to confer with the Plaintiffs. Plaintiff Andre Bisasor does not assent to this request. Plaintiff Natalie Anderson did not respond to multiple requests regarding her position on the request.

6. Pursuant to Local Rule 7.2(a), this request – to extend Mr. Hilliard’s responsive pleading deadline to September 3, 2025 – will not result in the continuance of any hearing, conference, or trial as there are none scheduled as of this filing.

WHEREFORE, for the reasons set forth above, Defendant Russell F. Hilliard respectfully requests this Honorable Court to:

A. Grant this Motion and extend his deadline to respond to the First Amended Complaint to September 3, 2025; and

B. Grant such other relief as may be just and proper.

Respectfully submitted,
The Defendant,
RUSSELL F. HILLIARD,
By his attorneys,

/s/ Daniel R. Sonneborn

Daniel R. Sonneborn, NH Bar #20947

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Dated: August 12, 2025

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of this document to be served via electronic filing on all counsel of record and Andre Bisasor on August 12, 2025 and will be served on Plaintiff, Natalie Anderson by first-class mail and electronic mail as follows:

Natalie Anderson, Pro Se
101 Middlesex Turnpike, #270
Burlington, MA 01801
liberty_6@msn.com

/s/ Daniel R. Sonneborn
Daniel R. Sonneborn